

IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

ANNIE WOODALL,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP, INC;
AMERICAN GENERAL CORPORATION;
AMERICAN GENERAL FINANCE, INC.;
AMERICAN GENERAL FINANCIAL SERVICES
OF ALABAMA, INC.; AMERICAN GENERAL
FINANCE CORPORATION;
MERIT LIFE INSURANCE COMPANY;
YOSEMITE INSURANCE COMPANY;
LINDA GRIGGS; KATHIE ROWELL;
TINA COOK; BRIAN MILLER; KEN HAMILL;
and Fictitious Defendants "A",
"B", and "C", whether singular or plural, those
other persons, corporations, firms, or other
entities whose wrongful conduct caused
the injuries and damages to the Plaintiff,
all of whose true and correct names are
unknown to Plaintiff at this time, but will
be substituted by amendment when ascertained,

Defendants.

CIVILCASE NO. 05-238

FILED IN
CIRCUIT CLERKS OFFICE
MACON COUNTY, AL
2005 DEC 13 P 4:07
EDDIE D. MALLARD
CIRCUIT CLERK

COMPLAINTSTATEMENT OF THE PARTIES

1. This court has subject matter and personal jurisdiction over the Defendants. Venue is proper in Macon County, Alabama.
2. Plaintiff Annie Woodall is an adult resident citizen of Macon County, Alabama.
3. Defendant American General Finance, Inc. is a domestic corporation, who does business by agent in Macon County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the "alter-ego" of one or more Defendants.



4. Defendant American General Financial Services of Alabama, Inc. is a domestic corporation, who does business by agent in Macon County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the “alter-ego” of one or more Defendants.

5. Defendant American International Group, Inc. is a foreign corporation who does business by agent in Macon County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the “alter-ego” of one or more Defendants.

6. Defendant American General Corporation is a foreign insurance Company who does business by agent in Macon County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the “alter-ego” of one or more Defendants.

7. Defendant American General Finance Corporation is a foreign insurance Company who does business by agent in Macon County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the “alter-ego” of one or more Defendants.

8. Defendant Merit Life Insurance Company is a foreign insurance company who does business by agent in Macon County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the “alter-ego” of one or more Defendants.

9. Defendant Yosemite Insurance Company is a foreign corporation who does business by agent in Macon County, Alabama. This Defendant is the parent corporation, agent, a subsidiary, sister corporation, and/or the “alter-ego” of one or more Defendants.

10. Defendant Linda Griggs is over the age of nineteen (19) and is a resident of Lee County, Alabama.

11. Defendant Kathie Rowell is over the age of nineteen (19) and is a resident of Lee County, Alabama.

12. Defendant Tina Cook is over the age of nineteen (19) and is a resident of Lee County, Alabama.

13. Defendant Brain Miller is over the age of nineteen (19) and is a resident of Lee County, Alabama.

14. Defendant Ken Hamill is over the age of nineteen (19) and is a resident of Lee County, Alabama.

15. Fictitious Defendants "A", "B", and "C", whether singular or plural, are those other persons, firms, corporations, or other entities whose wrongful conduct caused or contributed to cause the injuries and damages to the Plaintiff, all of whose true and correct names are unknown to Plaintiff at this time, but will be substituted by amendment when ascertained.

16. Plaintiff's claims are brought solely under Alabama law, and Plaintiff states she does not bring any claim and/or disclaims any and all claims under any Federal laws, statutes, or regulations.

STATEMENT OF THE FACTS

17. On or about December 8, 1993, August 31, 1995, January 24, 1997, August 22, 1997, and other occasions, Plaintiff entered into loans with Defendant American General Financial Services of Alabama, Inc. or Defendant American General Finance, Inc. Defendants Linda Griggs, Kathie Rowell, Tina Cook, Brian Miller, and Ken Hamill handled one or more of these loan transactions, while acting as agents for all Defendants, and fraudulently represented to her that if she purchased the credit insurance offered her, her credit score/rating would be better and that she stood a better chance of getting approved for the loan she requested.

18. Defendants advised Plaintiff that if she refinanced her previous loans into a single loan, that would be the best way for her to save money. Defendants refused to allow Plaintiff to have a separate loan.

19. Defendants advised Plaintiff that purchasing the credit insurance offered was a good deal and offered great value and protection.

20. Defendants had a duty to Plaintiff to give her good advice and they failed to do so, to Plaintiff's detriment.

21. Based on each of the representations made by Defendants, Plaintiff agreed to purchase the credit insurance offered and refinance her loan.

22. Defendants' conduct under the circumstances was intentional and amounts to actual malice.

23. Plaintiff discovered the fraud within two (2) years of filing this lawsuit.

24. Defendants entered into a pattern or practice of fraudulent conduct that included the fraud practiced on Plaintiff.

25. At all times material hereto, Plaintiff depended on Defendants to advise her as to all loan requirements and insurance matters. Defendants had superior knowledge and bargaining power over Plaintiff.

26. The conduct by Defendants was intentional, gross, wanton, malicious, and/or oppressive.

COUNT ONE

27. Plaintiff alleges all prior paragraphs of the Complaint as if set out here in full.

28. Defendants made the aforementioned fraudulent representations that they knew were false, or should have known were false, and intended for Plaintiff to rely on said false representations.

29. Plaintiff did rely on the representations made by Defendants and due to Defendants' fraudulent misrepresentation of material facts, Plaintiff was induced to act as previously described.

30. As a proximate consequence of Defendants' actions, Plaintiff was injured and damaged in at least the following ways: she paid money for insurance she did not want, she lost interest on said money, she paid excessive interest on her loans and accounts she otherwise would not have had to pay, she lost interest on the money attributed to the unnecessary payments, she has suffered mental anguish and emotional distress; and has otherwise been injured and damaged.

WHEREFORE, Plaintiff demands judgment against Defendants in such an amount of compensatory and punitive damages as a jury deems reasonable and may award, plus costs.

COUNT TWO

31. Plaintiff alleges all prior paragraphs of the Complaint as if set out here in full.

32. Defendants negligently and/or wantonly hired, trained, and supervised Defendants Linda Griggs, Kathie Rowell, Tina Cook, Brian Miller, and Ken Hamill and their agents, alter-egos and/or representatives responsible for advising Plaintiff of the loan and insurance benefits and all other requirements.

33. As a proximate consequence of Defendants' actions, Plaintiff was injured and damaged as alleged herein.

WHEREFORE, Plaintiff demands judgment against Defendants in such an amount of compensatory and punitive damages as a jury deems reasonable and may award, plus costs.

COUNT THREE

34. Plaintiff alleges all prior paragraphs of the Complaint as if set out here in full.

35. Plaintiff was not experienced in insurance and finance matters and placed a special trust and confidence in Defendants and consequently relied upon Defendants to properly advise her with respect to such matters.

36. Defendants undertook a duty to advise Plaintiff, held themselves out as experts, and as persons interested in Plaintiff's well-being, and generally exhibited behavior inconsistent with the typical debtor-creditor relationship.

37. As a result of the aforementioned actions, Defendants conduct amounts to a breach of their individual, contractual, professional and fiduciary obligations and duties to Plaintiff. Said conduct further amounts to a breach of the duties that arise as a matter of Alabama law.

38. As a proximate consequence of the Defendants breach, Plaintiff was injured and damaged as alleged herein.

WHEREFORE, Plaintiff demands judgment against Defendants in such an amount of compensatory and punitive damages as a jury deems reasonable and may award, plus costs.

COUNT FOUR

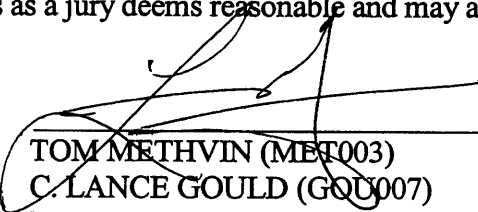
39. Plaintiff alleges all prior paragraphs of the Complaint as if set out here in full.

40. Defendants negligently and/or wantonly made the aforementioned representations to Plaintiff.

41. Said action was a breach of the duty owed Plaintiff.

42. As a proximate consequence of said actions, Plaintiff was injured and damaged as described herein.

WHEREFORE, Plaintiff demands judgment against Defendants in such an amount of compensatory and punitive damages as a jury deems reasonable and may award, plus costs.



TOM METHVIN (MET003)
C. LANCE GOULD (GOU007)
WILLIAM H. ROBERTSON, V (ROB161)
Attorneys for Plaintiff

OF COUNSEL:
BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES, P.C.
272 Commerce Street
Montgomery, Alabama 36104
Telephone No.: (334) 269-2343
Facsimile No.: (334) 954-7555

**PLAINTIFF REQUESTS TRIAL BY STRUCK JURY
OF ALL ISSUES PRESENTED BY THIS CAUSE**



OF COUNSEL

IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

ANNIE WOODALL,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP, INC;
AMERICAN GENERAL CORPORATION;
AMERICAN GENERAL FINANCE, INC.;
AMERICAN GENERAL FINANCIAL SERVICES
OF ALABAMA, INC.; AMERICAN GENERAL
FINANCE CORPORATION;
MERIT LIFE INSURANCE COMPANY;
YOSEMITE INSURANCE COMPANY;
LINDA GRIGGS; KATHIE ROWELL;
TINA COOK; BRIAN MILLER; KEN HAMILL;
and Fictitious Defendants "A",
"B", and "C", whether singular or plural, those
other persons, corporations, firms, or other
entities whose wrongful conduct caused
the injuries and damages to the Plaintiff,
all of whose true and correct names are
unknown to Plaintiff at this time, but will
be substituted by amendment when ascertained,

Defendants.

CIVILCASE NO. 05-238

EDDIE D. MALLARD
CIRCUIT CLERK

2005 DEC 13 P 4:07

FILED IN
CIRCUIT CLERKS OFFICE
MACON COUNTY, ALSUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

Linda Griggs
c/o American General Finance, Inc.
1848 Opelika Road
Auburn, Alabama 36830

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint to,

C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Eddie D. Mella
CIRCUIT CLERK

Dated: 12/13/05

C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Eddie D. Haller
CIRCUIT CLERK

Dated: 12/13/05

IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

ANNIE WOODALL,

Plaintiff,

vs.

CIVILCASE NO. 05-238

AMERICAN INTERNATIONAL GROUP, INC;
AMERICAN GENERAL CORPORATION;
AMERICAN GENERAL FINANCE, INC.;
AMERICAN GENERAL FINANCIAL SERVICES
OF ALABAMA, INC.; AMERICAN GENERAL
FINANCE CORPORATION;
MERIT LIFE INSURANCE COMPANY;
YOSEMITE INSURANCE COMPANY;
LINDA GRIGGS; KATHIE ROWELL;
TINA COOK; BRIAN MILLER; KEN HAMILL;
and Fictitious Defendants "A",
"B", and "C", whether singular or plural, those
other persons, corporations, firms, or other
entities whose wrongful conduct caused
the injuries and damages to the Plaintiff,
all of whose true and correct names are
unknown to Plaintiff at this time, but will
be substituted by amendment when ascertained,

Defendants.

FILED IN
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MACON COUNTY, AL
2005 DEC 13 P 4: 06
EDDIE D. MALLA
CIRCUIT CLERK

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

YOSEMITE INSURANCE COMPANY
c/o Superintendent of Insurance
717 Market Street
San Francisco, CA 94103

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint to,

C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Eddie D. Hallard
CIRCUIT CLERK

Dated: 12/13/05

IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

ANNIE WOODALL,

Plaintiff,

vs.

CIVILCASE NO. 05-238

AMERICAN INTERNATIONAL GROUP, INC;
AMERICAN GENERAL CORPORATION;
AMERICAN GENERAL FINANCE, INC.;
AMERICAN GENERAL FINANCIAL SERVICES
OF ALABAMA, INC.; AMERICAN GENERAL
FINANCE CORPORATION;
MERIT LIFE INSURANCE COMPANY;
YOSEMITE INSURANCE COMPANY;
LINDA GRIGGS; KATHIE ROWELL;
TINA COOK; BRIAN MILLER; KEN HAMILL;
and Fictitious Defendants "A",
"B", and "C", whether singular or plural, those
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entities whose wrongful conduct caused
the injuries and damages to the Plaintiff,
all of whose true and correct names are
unknown to Plaintiff at this time, but will
be substituted by amendment when ascertained,

Defendants.

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

MERIT LIFE INSURANCE COMPANY
c/o Superintendent of Insurance
601 NW Second Street
Evansville, IN 47708

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint to,

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PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Eddie D. Hall
CIRCUIT CLERK

Dated: 12/13/05

IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

ANNIE WOODALL,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP, INC;
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AMERICAN GENERAL FINANCE, INC.;
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Defendants.

CIVILCASE NO. 05-238

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SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

AMERICAN GENERAL FINANCIAL
SERVICES OF ALABAMA, INC.
c/o CSC Lawyers Incorporating Service, Inc.
150 S. Perry Street
Montgomery, AL 36104

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IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

ANNIE WOODALL,

Plaintiff,

vs.

CIVILCASE NO. 05-238

AMERICAN INTERNATIONAL GROUP, INC;
AMERICAN GENERAL CORPORATION;
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OF ALABAMA, INC.; AMERICAN GENERAL
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Defendants.

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CIRCUIT CLERKS OFFICE
MACON COUNTY, AL
2005 DEC 13 P 4:06
EDDIE D. MALLARD
CIRCUIT CLERK

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

AMERICAN GENERAL FINANCE, INC.
n/k/a American General Financial Services of Alabama, Inc.
c/o CSC Lawyers Incorporating Service, Inc.
150 S. Perry Street
Montgomery, AL 36104

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**C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160**

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Eddie D. Mallett
CIRCUIT CLERK

Dated: 12/13/05

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ANNIE WOODALL,

Plaintiff,

vs.

CIVILCASE NO. 05-238

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be substituted by amendment when ascertained,

Defendants.

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

AMERICAN GENERAL CORPORATION
2929 Allen Parkway
Houston, TX 77019

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint to,

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CIRCUIT CLERK

C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.


CIRCUIT CLERK

Dated: 12/13/05

IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

ANNIE WOODALL,

Plaintiff,

vs.

CIVILCASE NO. 05-238

AMERICAN INTERNATIONAL GROUP, INC;
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AMERICAN GENERAL FINANCIAL SERVICES
OF ALABAMA, INC.; AMERICAN GENERAL
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be substituted by amendment when ascertained,

Defendants.

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

AMERICAN INTERNATIONAL GROUP, INC.
70 Pine Street
New York, NY 10270

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Post Office Box 4160
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Eddie D. Hall
CIRCUIT CLERK

Dated: 12/13/05

IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

ANNIE WOODALL,

Plaintiff,

vs.

CIVILCASE NO. 05-238

AMERICAN INTERNATIONAL GROUP, INC;
AMERICAN GENERAL CORPORATION;
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unknown to Plaintiff at this time, but will
be substituted by amendment when ascertained,

Defendants.

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

Ken Hamill
c/o American General Finance, Inc.
1848 Opelika Road
Auburn, Alabama 36830

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BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160**

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.


CIRCUIT CLERK

Dated: 12/13/05

IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

ANNIE WOODALL,

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vs.

AMERICAN INTERNATIONAL GROUP, INC;
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CIRCUIT CLERK

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

Brian Miller
c/o American General Finance, Inc.
1848 Opelika Road
Auburn, Alabama 36830

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint to,

C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Eddie D. Mallett
CIRCUIT CLERK

Dated: 12/13/05

ALABAMA JUDICIAL DATA CENTER
COURT PAYMENT SYSTEM

COUNTY
DATE OF RECEIPT: 12/13/2005 TIME: 16:29:54 RECEIPT NUMBER: 040808
RECEIPT FOR CASE: CV 2005 000226 00 BATCH: 2004058
RECEIVED FROM: GOULD CHARLES LANCE

ANNIE WOODALL VS AMERICAN INTERNATIONAL GROUP, INC, ET AL

ACCOUNTS RECEIPTED:

EVOC	\$332.00
JDMD	\$100.00
GERA	\$145.00

RECEIVED BY: MAA CHECK AMOUNT \$592.00

State of Alabama Unified Judicial System	COVER SHEET CIRCUIT COURT – CIVIL CASE (Not For Domestic Relations Cases)	Case Number <div style="display: flex; justify-content: space-between;"><div>C V</div><div>2005 0238</div><div></div></div> Date of Filing: <div style="display: flex; justify-content: space-between;"><div>12 / 14</div><div>2005</div><div>X X X</div></div> <div style="display: flex; justify-content: space-around; font-size: small;">Month Day Year</div> Judge Code: <div style="text-align: right;">X X X</div>
IN THE CIRCUIT COURT OF _____ <div style="text-align: center;">ANNIE WOODALL Plaintiff <input type="checkbox"/> Business <input checked="" type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other</div> v. <div style="text-align: center;">MACON (Name of County) AMERICAN INTERNATIONAL GROUP Defendant <input checked="" type="checkbox"/> Business <input type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other</div>		
NATURE OF SUIT: Select primary cause of action, by checking box (check only one) the best characterizes your action:		
TORTS: PERSONAL INJURY <input type="checkbox"/> WDEA - Wrongful Death <input type="checkbox"/> TONG - Negligence: General <input type="checkbox"/> TOMV - Negligence: Motor Vehicle <input type="checkbox"/> TOWA - Wantonness <input type="checkbox"/> TOPL - Product Liability/AEMLD <input type="checkbox"/> TOMM - Malpractice-Medical <input type="checkbox"/> TOLM - Malpractice-Legal <input type="checkbox"/> TOOM - Malpractice-Other <input checked="" type="checkbox"/> TBFM - Fraud/Bad Faith/Misrepresentation <input type="checkbox"/> TOXX - Other: _____	OTHER CIVIL FILINGS (cont'd) <input type="checkbox"/> MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/ Enforcement of Agency Subpoena/Petition to Preserve <input type="checkbox"/> CVRT - Civil Rights <input type="checkbox"/> COND - Condemnation/Eminent Domain/Right-of-Way <input type="checkbox"/> CTMP - Contempt of Court <input type="checkbox"/> CONT - Contract/Ejectment/Writ of Seizure <input type="checkbox"/> TOCN - Conversion <input type="checkbox"/> EQND - Equity Non-Damages Actions/Declaratory Judgment/Injunction Election Contest/Quiet Title/Sale For Division <input type="checkbox"/> CVUD - Eviction Appeal/Unlawful Detainer <input type="checkbox"/> FORJ - Foreign Judgment <input type="checkbox"/> FORF - Fruits of Crime Forfeiture <input type="checkbox"/> MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition <input type="checkbox"/> PFAB - Protection From Abuse <input type="checkbox"/> FELA - Railroad/Seaman (FELA) <input type="checkbox"/> RPRO - Real Property <input type="checkbox"/> WTEG - Will/Trust/Estate/Guardianship/Conservatorship <input type="checkbox"/> COMP - Workers' Compensation <input type="checkbox"/> CVXX - Miscellaneous Circuit Civil Case	TORTS: PERSONAL INJURY <input type="checkbox"/> TOPE - Personal Property <input type="checkbox"/> TORE - Real Properly OTHER CIVIL FILINGS <input type="checkbox"/> ABAN - Abandoned Automobile <input type="checkbox"/> ACCT - Account & Nonmortgage <input type="checkbox"/> APAA - Administrative Agency Appeal <input type="checkbox"/> ADPA - Administrative Procedure Act <input type="checkbox"/> ANPS - Adults in Need of Protective Services
ORIGIN (check one): F <input checked="" type="checkbox"/> INITIAL FILING A <input type="checkbox"/> APPEAL FROM DISTRICT COURT O <input type="checkbox"/> OTHER: _____ R <input type="checkbox"/> REMANDED T <input type="checkbox"/> TRANSFERRED FROM OTHER CIRCUIT COURT		
HAS JURY TRIAL BEEN DEMANDED? <input type="checkbox"/> YES <input type="checkbox"/> NO Note: Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P., for procedure)		
RELIEF REQUESTED: <input checked="" type="checkbox"/> MONETARY AWARD REQUESTED <input type="checkbox"/> NO MONETARY AWARD REQUESTED		
ATTORNEY CODE: G O U O O 7 Date: 12-12-05 Signature of Attorney/Party filing this form: Charles Lance Gould		
MEDIATION REQUESTED: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNDECIDED		



7140 3901 9449 1049 6700

3. Service Type CERTIFIED MAIL

4. Restricted Delivery? (Extra Fee) ☐ Yes ☒ No

1. Article Addressed to:

American General Financial Services
of Alabama, Inc.
c/o CSC Lawyers Incorporating Service, Inc.
150 S. Perry Street
Montgomery, AL 36104

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

Donna Braun 12/19/05

B. Date of Delivery

C. Signature

X *Al Brown*☐ Agent ☐ AddresseeD. Is delivery address different from item 1? ☐ Yes ☒ No

If YES, enter delivery address below:

Reference Information

Annie Woodall v. American General
Charles Lance Gould

CV-05-238 sic

PS Form 3811, January 2005

Domestic Return Receipt

2. Article Number



7140 3901 9449 1049 6717

3. Service Type CERTIFIED MAIL

4. Restricted Delivery? (Extra Fee) ☐ Yes ☒ No

1. Article Addressed to:

American General Finance, Inc.
n/k/a American General Financial Services of
Alabama, Inc.
c/o CSC Lawyers Incorporating Service, Inc.
150 S. Perry Street
Montgomery, AL 36104

COMPLETE THIS SECTION ON DELIVERY

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Domestic Return Receipt

CV-05-238 sic

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If YES, enter delivery address below:

Reference Information

Annie Woodall v. American General
Charles Lance Gould

US

CV-05-238 sic

PS Form 3811, January 2005

Domestic Return Receipt

IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

ANNIE WOODALL,

Plaintiff,

vs.

CIVILCASE NO. 05-238

AMERICAN INTERNATIONAL GROUP, INC;
AMERICAN GENERAL CORPORATION;
AMERICAN GENERAL FINANCE, INC.;
AMERICAN GENERAL FINANCIAL SERVICES
OF ALABAMA, INC.; AMERICAN GENERAL
FINANCE CORPORATION;
MERIT LIFE INSURANCE COMPANY;
YOSEMITE INSURANCE COMPANY;
LINDA GRIGGS; KATHIE ROWELL;
TINA COOK; BRIAN MILLER; KEN HAMILL;
and Fictitious Defendants "A",
"B", and "C", whether singular or plural, those
other persons, corporations, firms, or other
entities whose wrongful conduct caused
the injuries and damages to the Plaintiff,
all of whose true and correct names are
unknown to Plaintiff at this time, but will
be substituted by amendment when ascertained,

Defendants.

FILED IN
CIRCUIT CLERKS OFFICE
MACON COUNTY, AL
2005 DEC 13 P 4: 07
EDDIE D. MALLAT
CIRCUIT CLERK

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

Tina Cook
c/o American General Finance, Inc.
1848 Opelika Road
Auburn, Alabama 36830

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint to,

C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Eddie D. Mallett
CIRCUIT CLERK

Dated: 12/13/05

IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

ANNIE WOODALL,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP, INC;
AMERICAN GENERAL CORPORATION;
AMERICAN GENERAL FINANCE, INC.;
AMERICAN GENERAL FINANCIAL SERVICES
OF ALABAMA, INC.; AMERICAN GENERAL
FINANCE CORPORATION;
MERIT LIFE INSURANCE COMPANY;
YOSEMITE INSURANCE COMPANY;
LINDA GRIGGS; KATHIE ROWELL;
TINA COOK; BRIAN MILLER; KEN HAMILL;
and Fictitious Defendants "A",
"B", and "C", whether singular or plural, those
other persons, corporations, firms, or other
entities whose wrongful conduct caused
the injuries and damages to the Plaintiff,
all of whose true and correct names are
unknown to Plaintiff at this time, but will
be substituted by amendment when ascertained,

Defendants.

CIVILCASE NO. 05-238

FILED IN
CIRCUIT CLERKS OFFICE
MACON COUNTY, AL
2005 DEC 13 P 4: 07
EDDIE D. MALLAT
CIRCUIT CLERK

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

Kathie Rowell
c/o American General Finance, Inc.
1848 Opelika Road
Auburn, Alabama 36830

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint to,

C. Lance Gould
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Eddie D. Mallett
CIRCUIT CLERK

Dated: 12/13/05